



EXHIBIT

Higgins 19
9-10-05

001576

spring summer collection 2009

001577

Bel Circolo

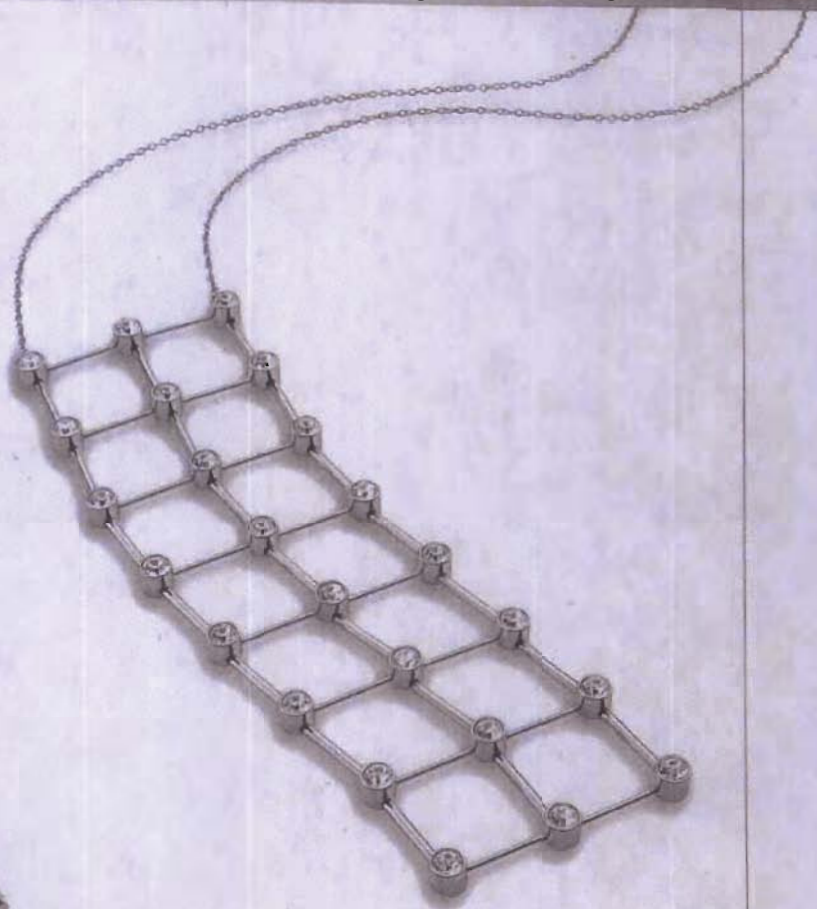


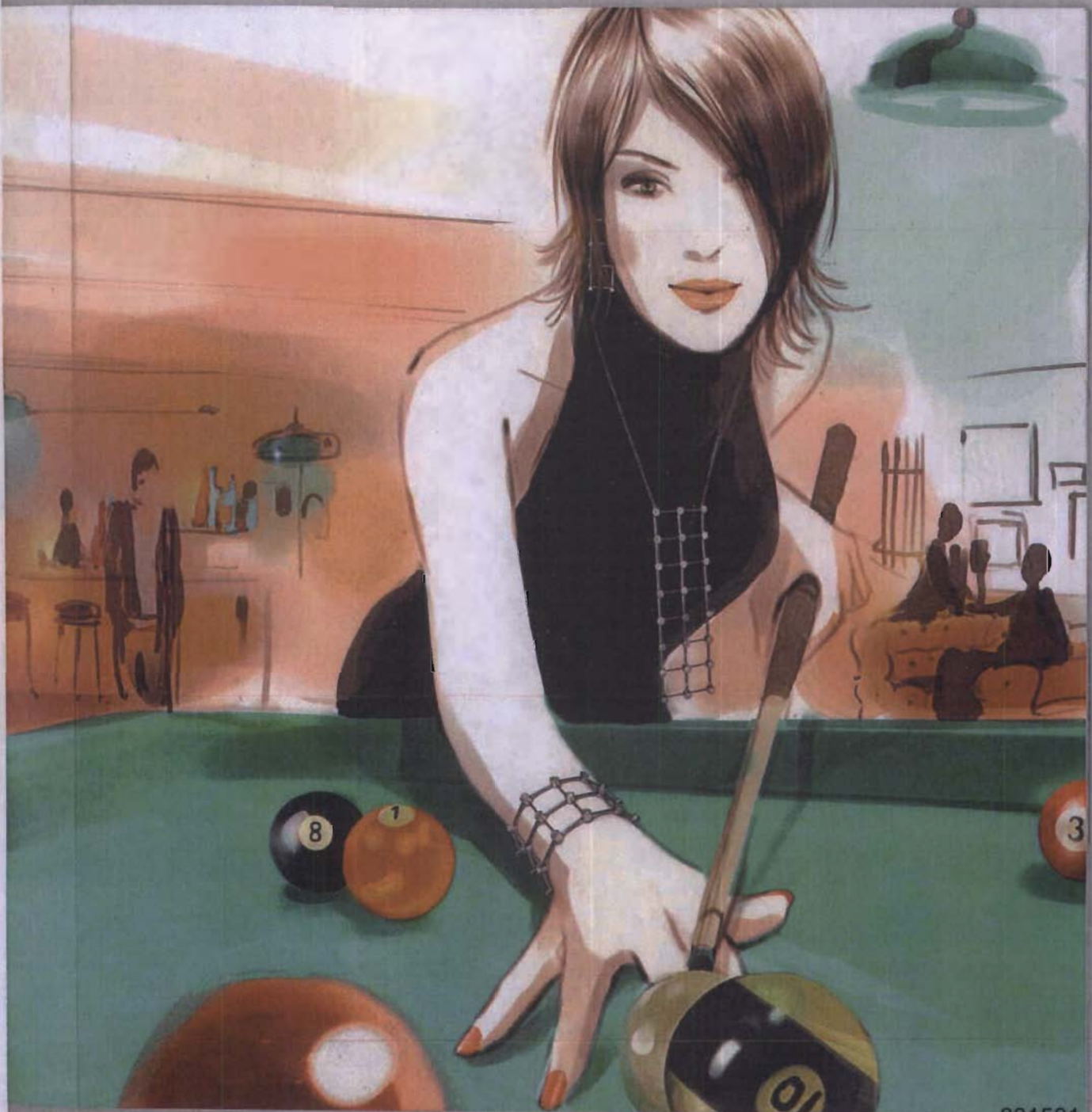
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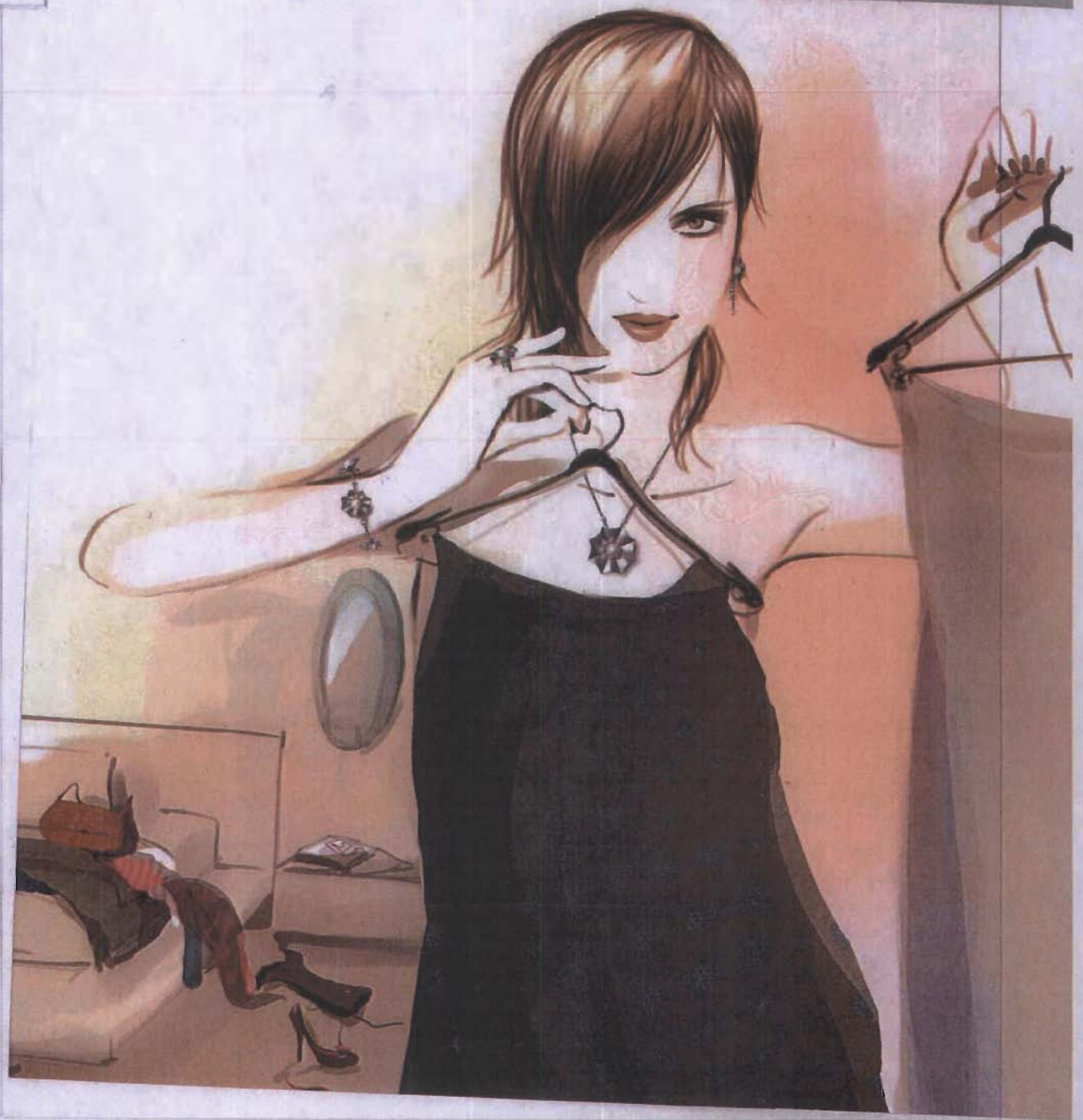
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Nightmesh





001581





Melodiosa



Spring-Thing





001585

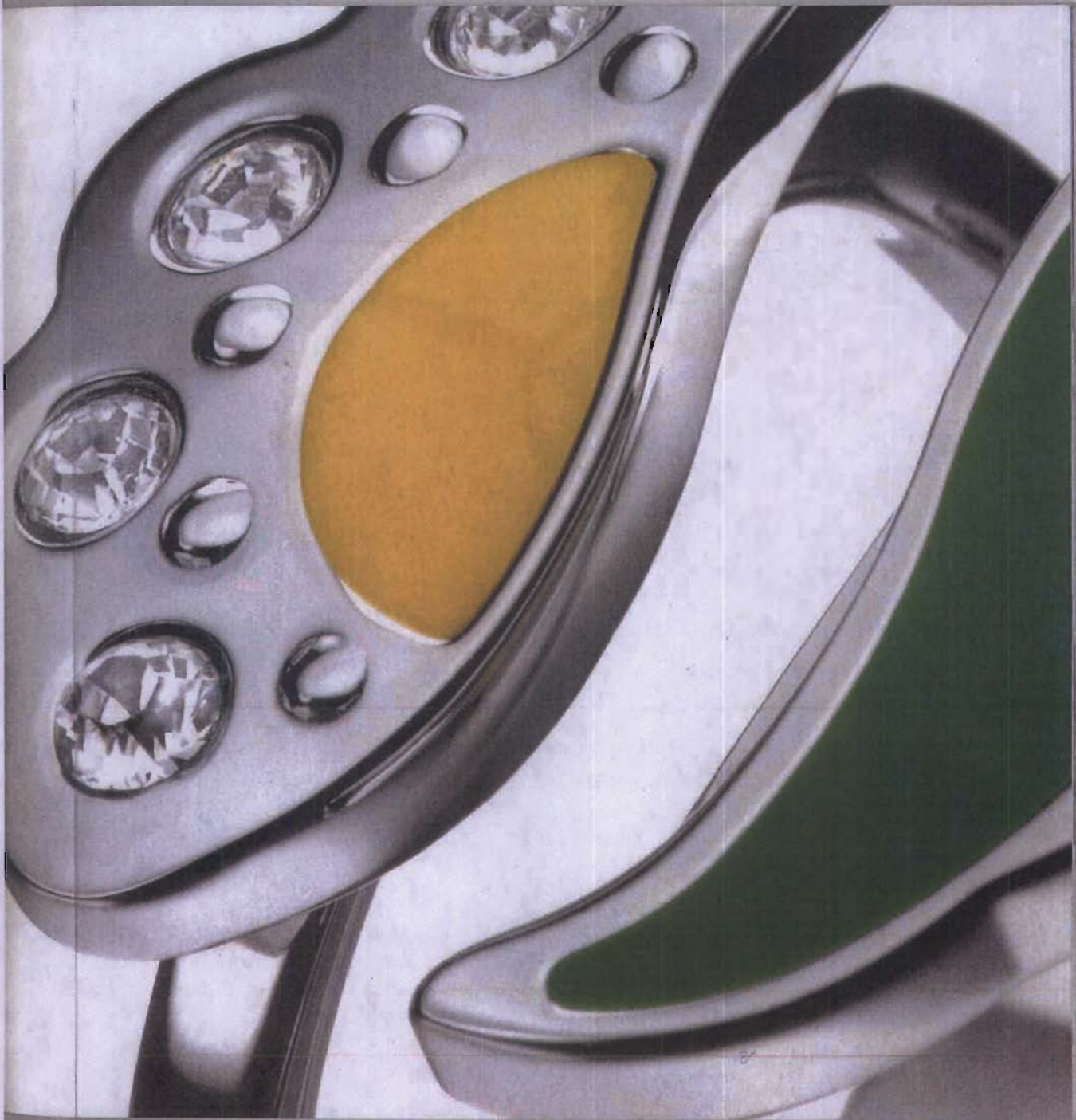




Batik Pop

Natural Duet





001589

Amorito





001591

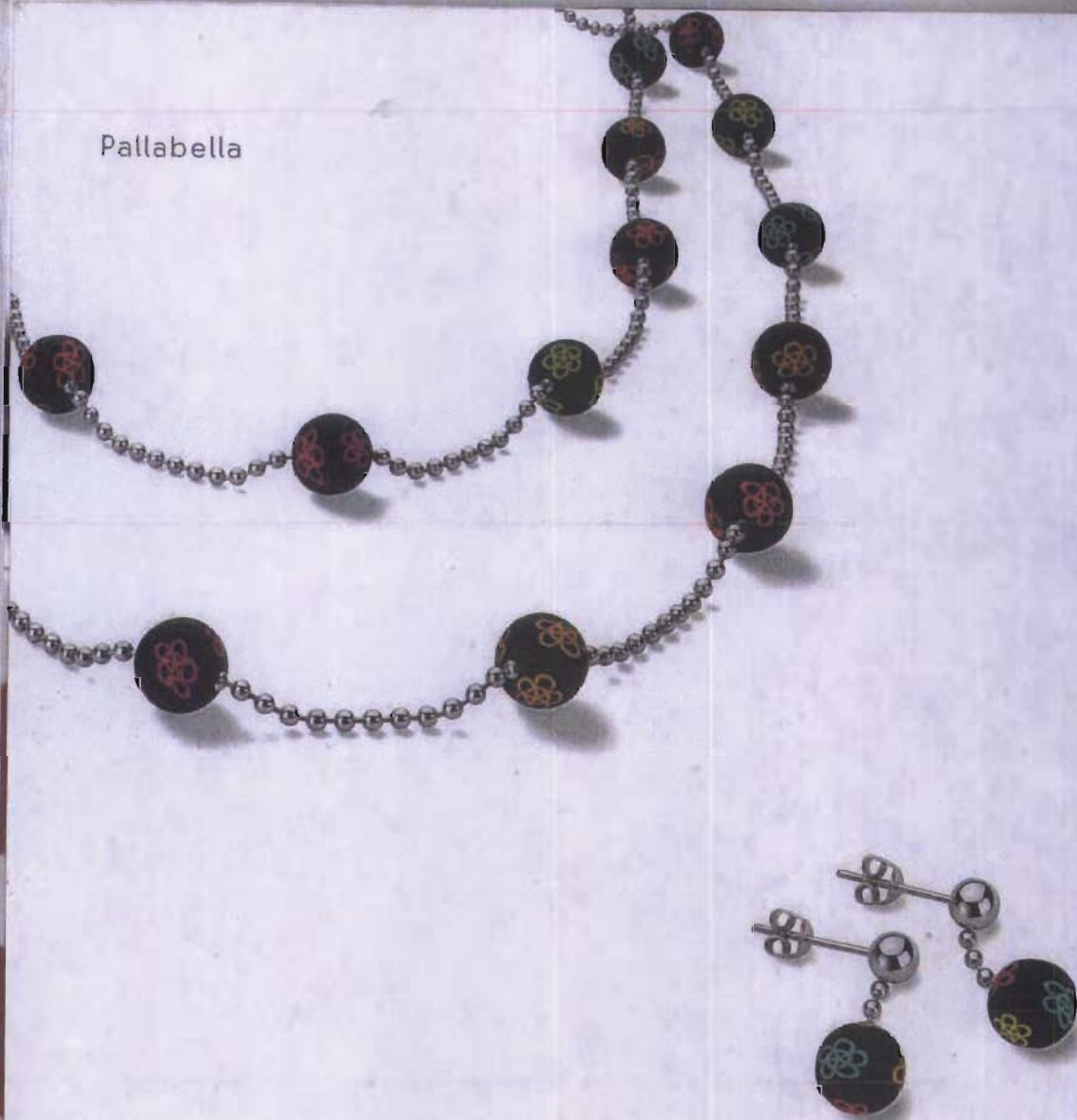


Fluonik

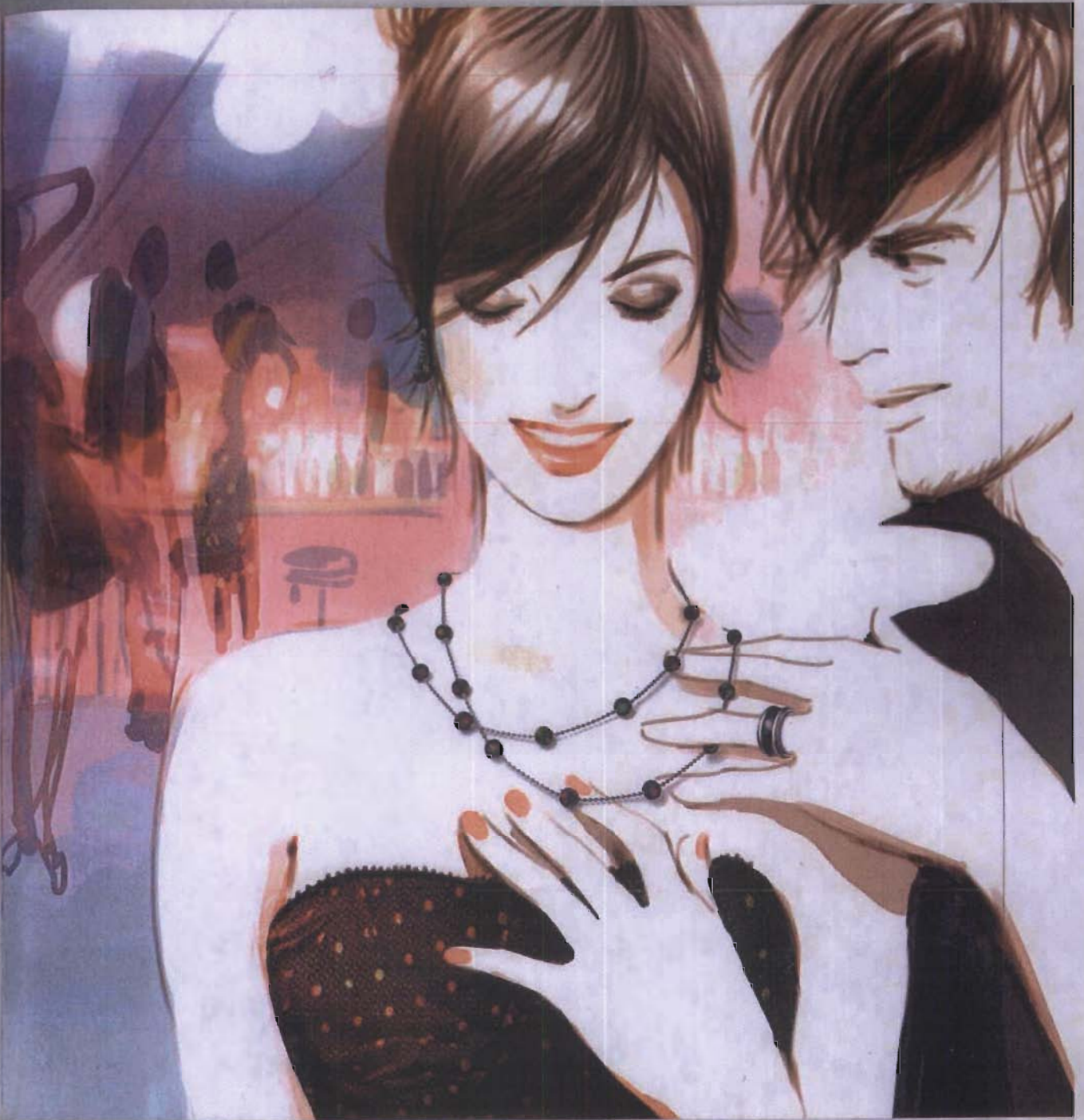


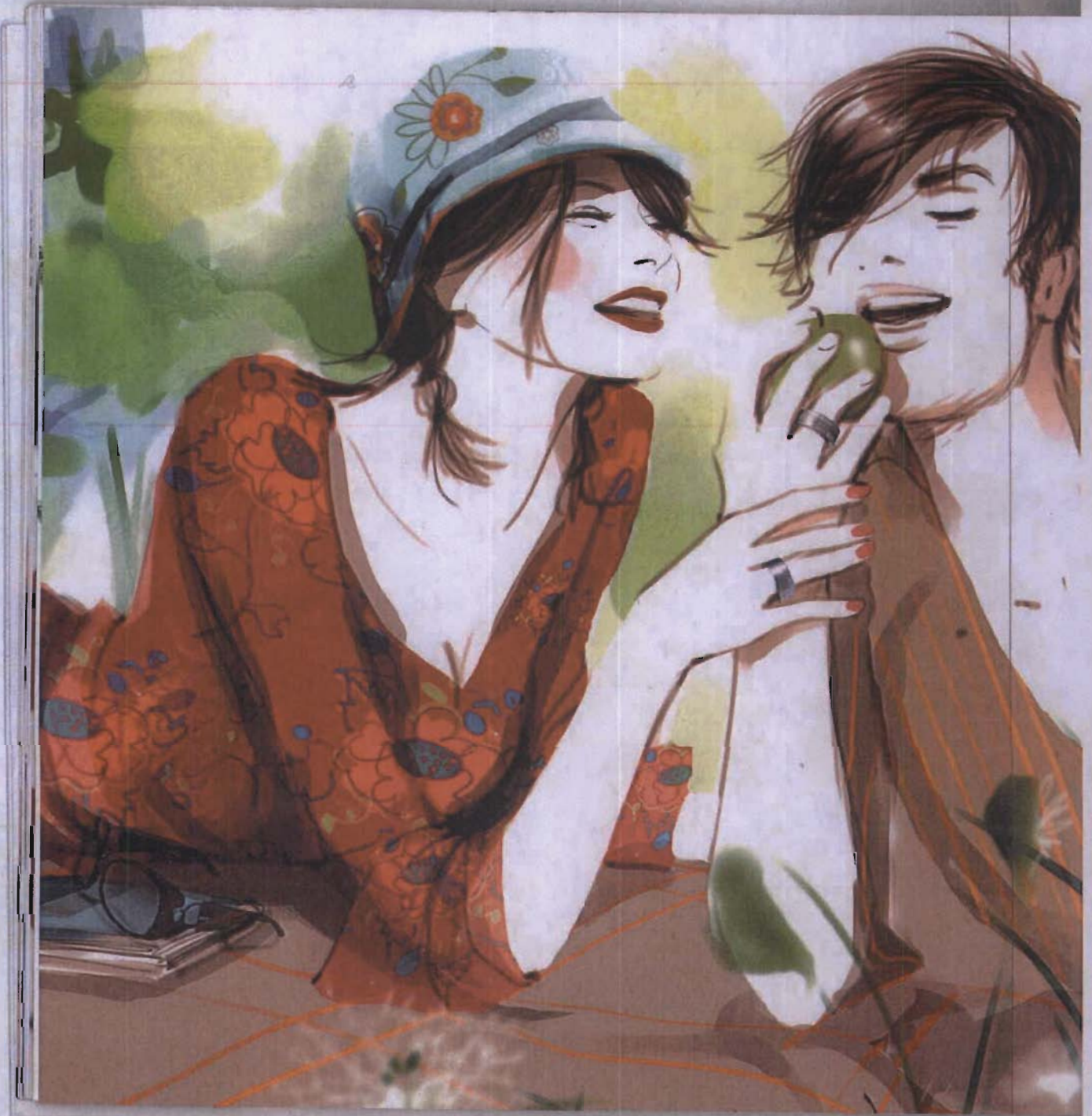
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Pallabella



001594





6

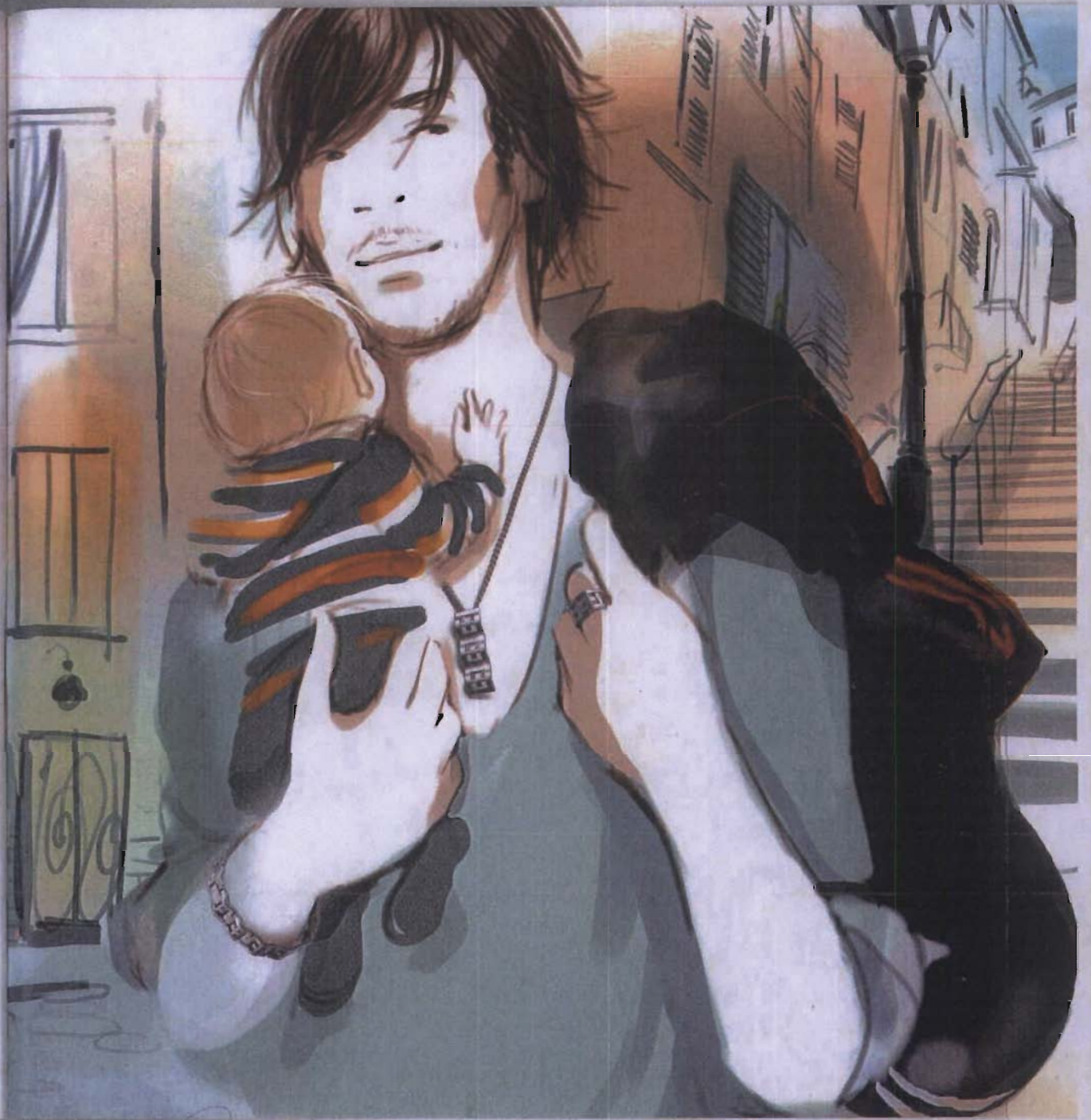
Iron Railing



Unfenceless



001598





Heave out



001601

Bel Circolo



Pendent. One size.
Stainless steel 316L + white synthetic
resin + white crystal + stainless steel
316L with pink gold PVD. JPW011.



Bracelet. One size.
Stainless steel 316L + white synthetic
resin + white crystal + stainless steel
316L with pink gold PVD. JBW006.

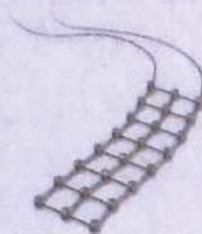


Ring. Sizes 5, 6, 7, 8, 9.
Stainless steel 316L + white synthetic
resin + white crystal + stainless steel
316L with pink gold PVD. JRW019.

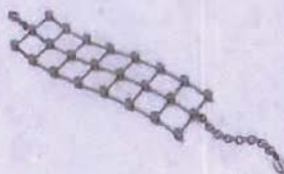


Earrings. One size.
Stainless steel 316L + white synthetic
resin + white crystals + stainless steel
316L with pink gold PVD. JEW008.

Nightmesh



Pendent. One size.
Stainless steel 316L + white crystals.
JPM047.



Bracelet. One size.
Stainless steel 316L + white crystals.
JBM047.



Ring. Sizes 5, 6, 7, 8, 9.
Stainless steel 316L + white crystals.
JRM056.



Earrings. One size.
Stainless steel 316L + white crystals.
JEM050.

Melodiosa



Pendent. One size.
Stainless steel 316L + white crystal
pearls. JPM046.



Bracelet. One size.
Stainless steel 316L + white crystal
pearls. JBM046.



Ring. Sizes 5, 6, 7, 8, 9.
Stainless steel 316L + white crystal
pearl. JRM055.



Earrings. One size.
Stainless steel 316L + white crystal
pearls. JEM029.

Spring-Thing



synthetic
less steel
EW008.

Pendent. One size.
Stainless steel 316L + multicoloured
synthetic resin + white crystals.
JPM049.



Bracelet. One size.
Stainless steel 316L + multicoloured
synthetic resin + white crystals.
JBM049.

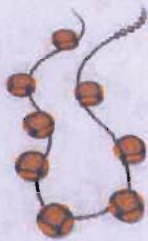


Ring. Sizes 5, 6, 7, 8, 9.
Stainless steel 316L + multicoloured
synthetic resin + white crystals.
JRM058.



Earrings. One size.
Stainless steel 316L + multicoloured
synthetic resin + white crystals.
JEM052.

Batik Pop



crystals.

Necklace. One size.
Stainless steel 316L + multicoloured
polymer clay. JPD026.



Bracelet. One size.
Stainless steel 316L + multicoloured
polymer clay. JBD022.



Ring. Sizes 5, 6, 7, 8, 9.
Stainless steel 316L + multicoloured
polymer clay. JRD036.



Earrings. One size.
Stainless steel 316L + multicoloured
polymer clay. JED018.

Natural Duet



crystal

Pendent. One size.
Stainless steel 316L + multicoloured
synthetic resin + white crystals.
JPD028.



Bracelet. One size.
Stainless steel 316L + multicoloured
synthetic resin + white crystals.
JBD024.



Ring. Sizes 5, 6, 7, 8, 9.
Stainless steel 316L + multicoloured
synthetic resin + white crystals.
JRD038.



Earrings. One size.
Stainless steel 316L + multicoloured
synthetic resin + white crystals.
JED020.

Amorito



Pendant. One size.
Stainless steel 316L + red synthetic
resin. JPR011.



Bracelet. One size.
Stainless steel 316L + red synthetic
resin. JBR007.



Ring. Sizes 5, 6, 7, 8, 9.
Stainless steel 316L + red synthetic
resin. JRR025.



Earrings. One size.
Stainless steel 316L + red synthetic
resin. JER008.

Fluonik



Pendant. One size.
Stainless steel 316L + red synthetic
resin + red leather. JPR012.



Bracelet. Sizes S, M.
Stainless steel 316L + red synthetic
resin + red leather. JBR008.



Ring. Sizes 5, 6, 7, 8, 9.
Stainless steel 316L + red synthetic
resin. JRR026.



Earrings. One size.
Stainless steel 316L + red synthetic
resin. JER009.

Fluonik



Pendant. One size.
Stainless steel 316L + black synthetic
resin + black leather. JPR015.



Bracelet. Sizes S, M.
Stainless steel 316L + black synthetic
resin + black leather. JBR016.



Ring. Sizes 5, 6, 7, 8, 9.
Stainless steel 316L + black synthetic
resin. JRR020.



Earrings. One size.
Stainless steel 316L + black synthetic
resin. JER008.

Pallabella



Necklace. One size.
Stainless steel 316L + multicoloured
polymer clay. JPB015



Ring. Sizes 5, 6, 7, 8, 9
Stainless steel 316L + multicoloured
polymer clay. JRB018



Earrings. One size.
Stainless steel 316L + multicoloured
polymer clay. JEB007



Ring. Sizes 5, 6, 7, 8, 9, 10, 11.
Stainless steel 316L. JRM060

Unfenceless



Pendant. One size.
Stainless steel 316L. JPM050



Bracelet. Sizes L, XL.
Stainless steel 316L. JBM050



Ring. Sizes 9, 10, 11.
Stainless steel 316L. JRM059



Ring. Sizes 5, 6, 7, 8, 9, 10, 11.
Stainless steel 316L.
JRM013



Ring. Sizes 5, 6, 7, 8, 9, 10, 11.
Black coloured stainless steel 316L.
JRB003

Secret Code

Heave out



Pendant. One size.
Stainless steel 316L + black synthetic
resin. JPB014



Ring. Sizes 9, 10, 11.
Stainless steel 316L + black synthetic
resin. JRB019

Windlove



Pendant. One size.
Stainless steel 316L + red crystal
+ red polyester. JPM030

All for me



Pendant. One size.
Stainless steel 316L + red crystal
JPM055

All for me



Bracelet, One size.
Stainless steel 316L + red crystal.
JBM038.



Crystal Charms.
Stainless steel 316L + coloured
crystals. JMD002.



Pearl Charms.
Stainless steel 316L + crystal pearls
+ iridescent crystal cube. JMD004.



Roundy Boundy Charms.
Stainless steel 316L + stainless steel
316L with pink gold PVD
+ multicoloured polymer clay
+ white crystals. JMM006.

Love Explosion



Ring, Sizes 5, 6, 7, 8, 9.
Stainless steel 316L + fuchsia
polymer clay. JRR027.



Ring, Sizes 5, 6, 7, 8, 9.
Stainless steel 316L + turquoise
polymer clay. JRL003.



Ring, Sizes 5, 6, 7, 8, 9.
Stainless steel 316L + red
synthetic resin. JRR016.



Ring, Sizes 5, 6, 7, 8, 9.
Stainless steel 316L + off white
crystal pearls. JRW014.



Ring, Sizes 5, 6, 7, 8, 9.
Stainless steel 316L + iridescent
crystal cubes. JRD022.

Pila



Necklace, One size.
Stainless steel 316L + coloured
polymer clay. JPD006.



Bracelet, Sizes S, M.
Stainless steel 316L + coloured
polymer clay. JBD008.



Earrings, One size.
Stainless steel 316L + pink
polymer clay. JEP002.



Earrings, One size.
Stainless steel 316L + blue
polymer clay. JES006.

Glance-Magic



Pendent. One size.
Stainless steel 316L + white crystals.
JPM041.



Bracelet. Sizes S, M.
Stainless steel 316L + white crystals.
JBM041.



Ring. Sizes 5, 6, 7, 8, 9.
Stainless steel 316L + white crystals.
JRM050.



Earrings. One size.
Stainless steel 316L + white crystals.
JEM026.

Chemin Fleuri



Necklace. One size.
Stainless steel 316L.
JPM039.



Bracelet. One size.
Stainless steel 316L.
JBM039.



Ring. Sizes 5, 6, 7, 8, 9.
Stainless steel 316L.
JRM047.



Earrings. One size.
Stainless steel 316L.
JEM025.

Luludia



Pendent. One size.
Stainless steel 316L + black satin.
JPM027.



Bangle. Sizes S, M.
Stainless steel 316L.
JBM029.



Ring. Sizes 5, 6, 7, 8, 9.
Stainless steel 316L.
JRM037.



Earrings. One size.
Stainless steel 316L.
JEM017.

Trickle Light



Pendent, One size.
Stainless steel 316L + transparent
plexiglas, JPD023.



Bracelet, One size.
Stainless steel 316L + transparent
plexiglas, JBD019.



Ring, Sizes 5, 6, 7, 8, 9.
Stainless steel 316L + transparent
plexiglas, JRP022.



Earrings, One size.
Stainless steel 316L + transparent
plexiglas, JEP009.

Lustro



Necklace, One size.
Stainless steel 316L + white crystals,
JPM009.



Bracelet, Sizes S, M.
Stainless steel 316L + white crystals,
JBM013.



Ring, Sizes 5, 6, 7, 8, 9.
Stainless steel 316L + white crystals,
JRM015.



Earrings, One size.
Stainless steel 316L + white crystals,
JEW005.

Zampilo



Pendent, One size.
Stainless steel 316L
+ multicoloured synthetic resin
+ multicoloured polymer clay
+ crystals + lilac polyester,
JPD018.



Bracelet, One size.
Stainless steel 316L
+ multicoloured synthetic resin
+ multicoloured polymer clay
+ crystals + lilac polyester,
JBD017.



Earrings, One size.
Stainless steel 316L
+ multicoloured synthetic resin
+ multicoloured polymer clay
+ crystals, JED013.



Ring 1, Sizes 5, 6, 7, 8, 9.
Stainless steel 316L
+ multicoloured synthetic resin
+ multicoloured polymer clay
+ crystals, JRD030.

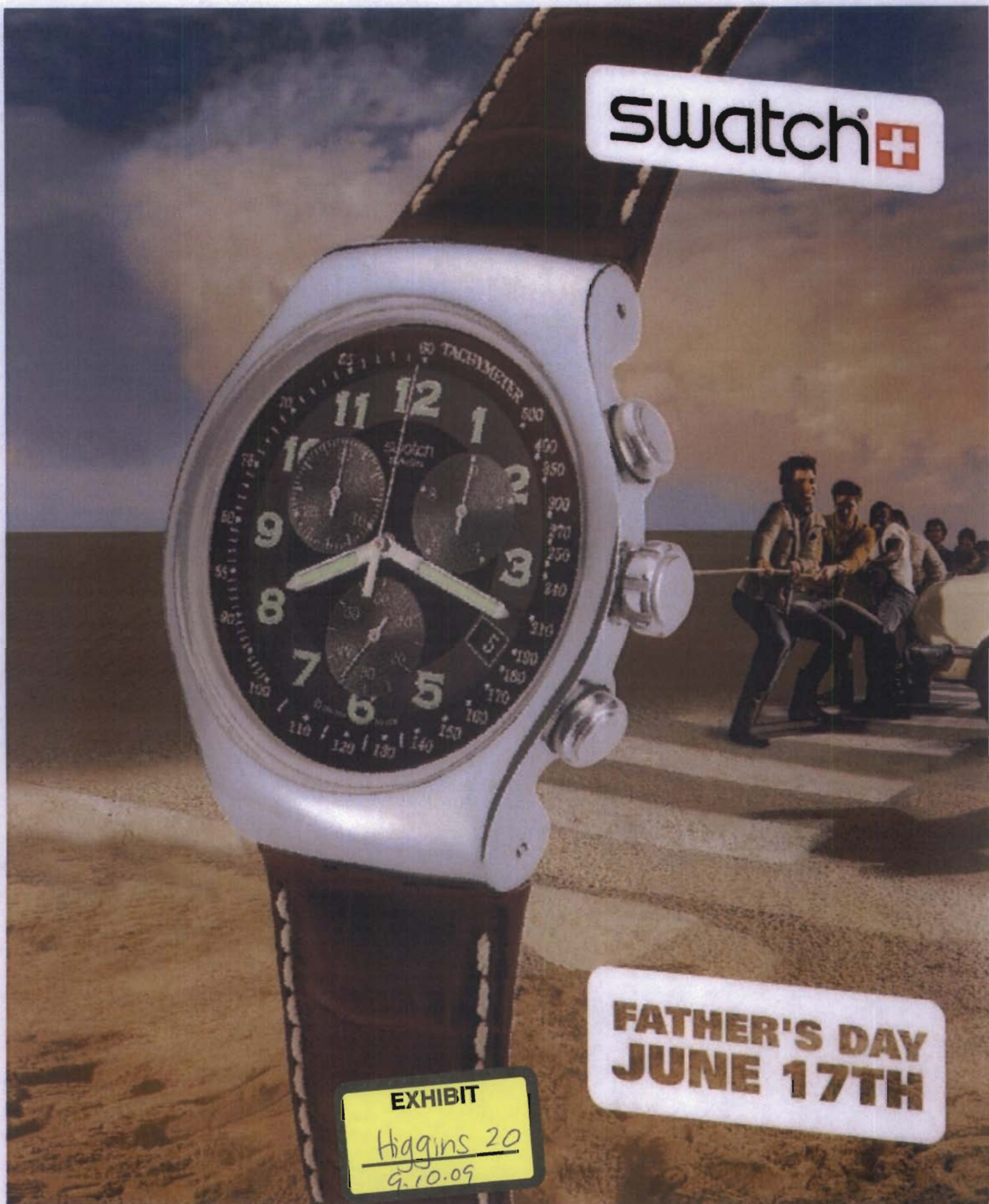


Ring 2, Sizes 5, 6, 7, 8, 9.
Stainless steel 316L
+ multicoloured synthetic resin
+ multicoloured polymer clay
+ crystals, JRD031.

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FATHER'S DAY
JUNE 17TH

EXHIBIT

Higgins 20
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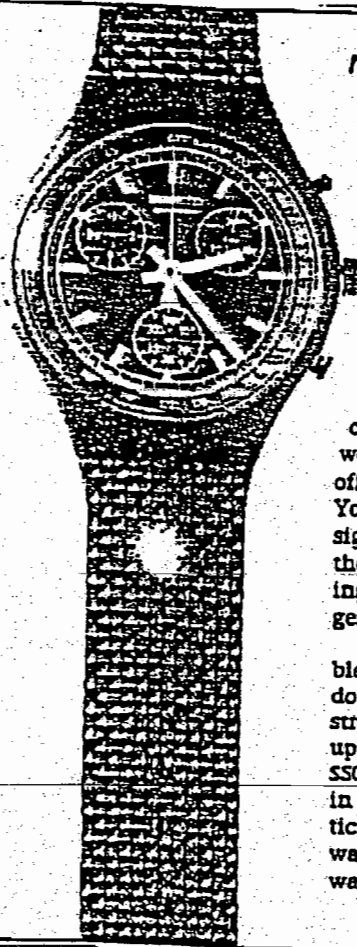


WIND LOVE_BY SWATCH
VALENTINE'S DAY 2007

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DALLAS, TX
NEWS
D. 390,987 — S. 531,417
DALLAS-FT. WORTH METROPOLITAN AREA

JUN 20 1991



Their time has come

Those colorful Swatch watches catch the fancy of collectors around the world.

By Julie Hatfield

Boston Globe

They're so hot, even the pope wants one. They've inspired cult clubs in 32 countries around the world. Sotheby's now auctions them off for thousands of dollars. In New York, hundreds of people have signed on to store waiting lists for them, and in Milan, Italians are willing to pay many times their suggested retail price.

They're Swatch watches, the bubblegum-colored watches with polka-dot numerals and Op Art print stretch watchbands that you can pick up in most department stores for \$40, \$50 or \$80. Packaged like cheap toys in hard, see-through, snap-apart plastic boxes, they are throwaway watches for kids (or childlike adults) waiting to grow up to their "real,"

more expensive watches that symbolize adulthood.

They have been around since 1983 and are sometimes little more than a sight gag, a wrist toy that goes with a couple of your most avant-garde outfits and costs no more than a good designer T-shirt. But they're cool, nevertheless, and that makes them hot.

And if the papal request for a Swatch isn't proof enough of their new appeal (the pope recently saw the Swatch chronograph on his tailor's wrist and requested one, according to Swatch's public relations staff in New York), then the recent Worldwide Swatch Auction, held by Sotheby's in Zurich, should be.

A Swatch by Italian artist Mimmo Paladino, with its strange black face. Please see SWATCH on Page 4C.

EXHIBIT

Higgins 21
9.10.09

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SWATCH news flash usc

GARY, IN
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D. 73.975—S. 87.302
CHICAGO METROPOLITAN AREA

Hot stuff



Swatch has introduced the Barrier Reef watch, part of its new spring collection.

Swatches inspired by about everything

It's that time of year again. Swatch, the Swiss company that revolutionized the world of timekeeping with its brightly colored plastic watches, just introduced their latest styles.

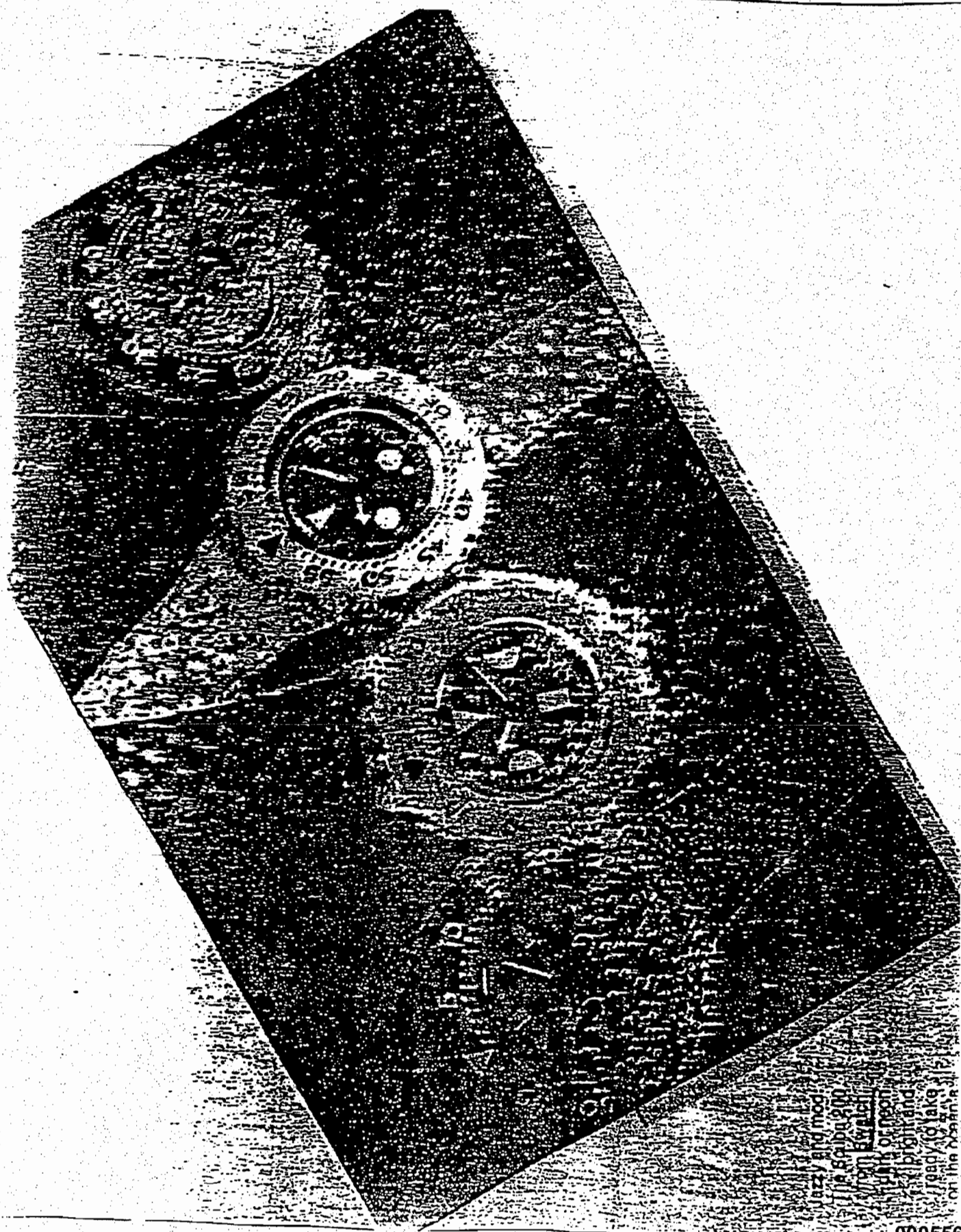
This season's collection is inspired by everything from Pop Art to nature, art to Byzantine architecture.

Swatch watches are known for being fun and fashionable, but now they're practical too.

Scuba 200 is the first plastic, water-resistant watch that works at depth of up to 200 meters. The watch, which comes in five styles, has a rotating bezel which can be set to measure bottom time.

The watch's hands are tritium-coated to allow visibility in dark waters and the heavy-duty clasp makes sure it will stay on your arm.

Swatch news flash us



swatch news flash usc

New York, NY
Observer
New York City Met Area

Monday

W 20.000

AUG 19 1991

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Swatch Frenzy in N.Y. as Auction Prices Climb

By Rachel Epstein

In New York, this is the summer of the Swatch. The prototype of a Swatch watch brought out in 1986 at \$50 is selling for \$8,800. Italian tourists have been seen lined up outside a not-yet-open Swatch dealer, flapping their arms to show that their plane is soon to leave and they must gain entry. Stores lucky enough to have a supply of the most desirable Swatch models impose buying limits or require the purchase of an ordinary Swatch along with the special one.

A Swatch is a plastic timepiece made in Biel, Switzerland. Each Swatch has a 22-jewel ticking quartz movement with 51 components instead of the usual 91, a three-year replaceable battery and a one-year warranty. Put together by robots, Swatches are hermetically sealed, making repairs impossible. They have an extremely low failure rate. Generally they sell for \$46 to \$80.

Swatches represent, as the company's catalogue says, the triumph of "style over luxury." The 600 different models made since the watch's debut in 1983 range from simple to bright, classic to funky, stripped down to encased in lace. In some, the works are visible. In others, the straps (though inedible) are flavored raspberry, banana or "ice mint," with corresponding colors. The twice-yearly collections focus on what's hot at the time: op art, pop art, discos, the Olympics and space and underwater exploration.

Swatch was the idea of Dr. Ernst Thom-

ke, now acting chairman and chief executive officer of Swatch USA, who, correctly, saw the product as a way to revive the Swiss watchmaking industry, which was fast losing ground to the Far East. Swatch is part of SMH, the company that makes Omega, Hamilton and Longines watches, with sales of \$1.6 billion.

There is general agreement that the Swatch frenzy began last September in Milan at an auction run by Sotheby's of un-

SHOPPING

worn, company-owned Swatches in limited editions of 120 to 9,999. Many purchase prices exceeded \$2,000 and two winning bids were over \$20,000, for models designed by European artists Kiki Picasso—no relation to Pablo—and Mimmo Paladino. Four watches designed by artist Keith Haring, \$50 each when they came out in 1986, were purchased at auction from \$2,500 to \$5,500 each. Other high prices were \$17,094 for a rare 1984 model called Jelly Fish (there have been other Jelly Fish, all extremely popular) and \$16,239 for a 1988 model called Royal Purf, which is edged in fur.

A subsequent article in Forbes magazine asserted that Swatch forced the bids by planting bidders and also alerted TV crews from three nations to help create the Milan furor. Swatch responded that bids were high because proceeds went to charity, for scholarships to Milan's Domus Art School.

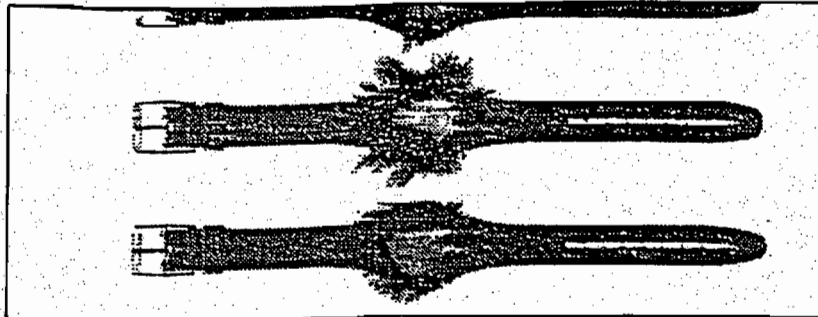
Forbes conceded that Sotheby's did waive its 13 percent commission, but noted that the event was "not billed as a charity affair."

Indeed, at two auctions held a few months later, prices fell off steeply from September's high and didn't begin a gradual climb back toward Milan's levels until auctions held in Zurich this spring, when prices for the Keith Haring watches were about 60 percent of what they had been in Milan.

European auction prices set the standard for dealers and collectors in the United States, where there has not yet been an auction. One Swatch dealer, Gerard Nally of Vincent Gerard Jewelers at Pier 17 at the South Street Seaport, has an office cluttered with faxes and letters requesting specific Swatches from previous years. He gives as his required prices the winning bids at the Zurich June 15 auction.

The Holy Grail among today's Swatch cognoscenti is the Chronograph, one of seven four-dial stopwatches made to sell for \$80. It was introduced in the United States in June, after it was no longer being produced for Europe, and has been hard to buy in New York at uninflated prices ever since. When I arrived at Gerard's at 3 P.M. on a recent Monday, Mr. Nally was explaining to a caller that the shipment of Chronographs he had been expecting at that hour would be coming instead at 5 P.M. When the shipment did arrive, it contained only 26 Chronographs instead of the

swatch+ news flash usc



Desert Puff Swatches, from the Blow Your Time Away line.

50 promised by Swatch. These went straight to the store's several-hundred-person waiting list, comprised almost exclusively of New Yorkers. Mr. Nally does not put Europeans on the list because he is not eager to sell Swatches to people who, he thinks, resell them in Europe "for inflated prices on the black market and along the beaches." Mr. Nally sells Chronographs for \$80 but insists that for every additional two Chronos after the first a customer must also purchase a regular Swatch at \$40.

At Aaron Faber (666 Fifth Avenue at 53rd Street), where owner Edward Faber sold a Keith Haring prototype for \$8,800 in June and where the Italians flap their arms to be let in, Europeans crowd the Swatch counter, eager to buy Chronographs. Mr. Faber requires the purchase of one \$40 Swatch with every \$80 Chronograph.

Buying a Chrono this summer at the \$80 price will take good timing. In a midsummer search, Chronographs turned up only at Etienne (425 Lexington Avenue at 43rd Street), a jeweler with large "Going out of Business" signs in the window, where I was quoted prices from \$160 to \$195, and at Aaron Faber, where the price was \$150. Mr. Faber defended his price by saying he sells watches shipped by Swatch at \$80, but that he had gone to the open market for what he was selling at the inflated price.

If you buy for resale appreciation, keep your Swatch unworn and in its original packaging; Mr. Faber said that worn Swatches lose three-quarters of their

potential value. Also, if you buy the Swatch catalogue (\$30) at Faber, you will be put on the mailing list for the store's quarterly Swatch newsletter. And start looking for 1991's hot item. A Swatch spokeswoman likes the Swatches by cartoon artist Giacom due out in the fall. Mr. Faber likes Swatches designed by the Swiss pop artist Hans Holzkunst, which were issued in Europe in June for \$80 apiece and, in a novel marketing ploy, are being sold only at vegetable stalls; sets of three are reputed to be selling for \$3,000 today. These models, said a Swatch spokesperson, will be in New York soon. Mr. Nally of Vincent Gerard recommends Asetra, a "gold" watch with a flexible band and lots of scrollwork. He has ordered 150 and plans to put 100 of them in his safe and wait—"for 10 years, if necessary"—for them to appreciate in value.

swatch news flash usa

The New York Times

All About/Watches

SUNDAY, NOVEMBER 17, 1991

Fighting the Recession By Spotting Some Fads And Inventing Others

By ISADORE BARMASH

PLAGUED by the recession, a 10 percent luxury tax on watches costing more than \$10,000 and the waning of brand loyalty, watchmakers and marketers are pulling out all the stops these days to sell their wares.

They are doing it by spicing up their lines with high-tech sports watches, multi-featured diving watches, new lines of trendy art watches as well as traditional, jewel-encrusted fashion offerings. They are also doing it by following the latest fad: offering reproductions of decades-old designs.

So far this year, world watch production is about equal to the 1989 level of 100 million units, according to *Modern Jeweler* magazine, a trade publication in Overland Park, Kan. Production was 85 million units in 1988. The largest producers of watches is Japan, followed by Hong Kong and Switzerland. The United States is primarily an assembler of watches from parts made elsewhere. Retail sales of all watches in the United States were about \$4.5 billion last year.

"Everyone has found a niche," observes Gerry Grinberg, chairman and chief executive of the North American Watch Company, the American distributor for such high-priced Swiss brands as Piaget, Concord and Movado. "The Swiss have taken the upper price end," he said. "The Japanese have taken the lower, or middle price bracket."

Only at the very low end of market — from \$25 to \$150 — is there a free-for-all. The Swiss have a share with Swatch, the Japanese with Casio and Seiko, the Americans with Armitron (sold under dozens of different names) and the Norwegians with Timex.

Timex, which is privately held, does not disclose its overall sales figures. Industry analysts say Timex dominates the low-end market with about 24 percent of market share. It also produces the nation's largest-selling watch: the Iron Man Triathlon, a digital watch priced at \$39.95 that sells about 500,000 units a year.

At least one battle in the industry now appears to have been settled: the protracted competition between digital and analog watches. Analog watches have hands; digital watches have displays. Analog watches may have quartz or mechanical movements, while digital watches are only quartz.

The digital watch dominated the 1970's and early '80's. But in 1985, analogs broke through: 173 million analogs were sold against only 149 million digitals. Digital watches regained their lead briefly in 1986 and 1987. But in 1988, analogs took back the lead, this time permanently, industry experts say. In 1990, 190 million analog watches were sold versus 242 million digitals.

Though quartz watches dominate the market, mechanical watches still have significant, though declining, sales. In 1990, 106 million mechanical watches were sold, down from 143 million in 1985.

A New Caution

Just 1 Trendy Item, Not a Whole Line

To gain sales momentum, the watch industry is relying on design flair and creativity. Companies are introducing watches in forms of cucumbers, strips of bacon and red peppers. Art watches — some with painted faces — are also making a reappearance.

But all that creativity is tempered caution due to the fragile financial condition of many of the nation's retailers. That frailty has caused some manufacturers to let their products differentiate.

Rather than developing entire line collections, "there's a trend toward marketing in the business today," said Leon Grunstein, president of the Citizen Watch Company of America, the American arm of the Citizen Watch Company of Japan. "You develop a hot item and you can sell 25,000 to 50,000 units," he said. "Retailers want those hot items, especially those involved in leveraged buying, who want faster inventory turnover and more effective use of shelf space to pay down debt."

But Seiko Time, the big Japanese producer, is still opting for collections of watches. This is especially the case with its "sport" watches, where 40 styles of analog-quartz watches will be introduced in a retail price range of \$250 to \$350.

Seiko is also bringing out a line of 10 watch styles for the 1992 Olympic Games. Seiko has been designated the official timekeeper for next year's Olympics to be held in Barcelona. "We're going to move aggressively on television with these watches," said Hal Lensky, Seiko's executive vice president of its American operations. "We feel the connection with the Olympics will draw a lot of attention to us."

swatch[®] news flash usa

Rescuing Swatch

It Couldn't Rely On Just Teen-Agers

What can a company do when its sales finally flatten out because the novelty of its low-price, fashion products fizzles? That is the question Swatch, a unit of SMH International, the big Swiss producer, asked itself.

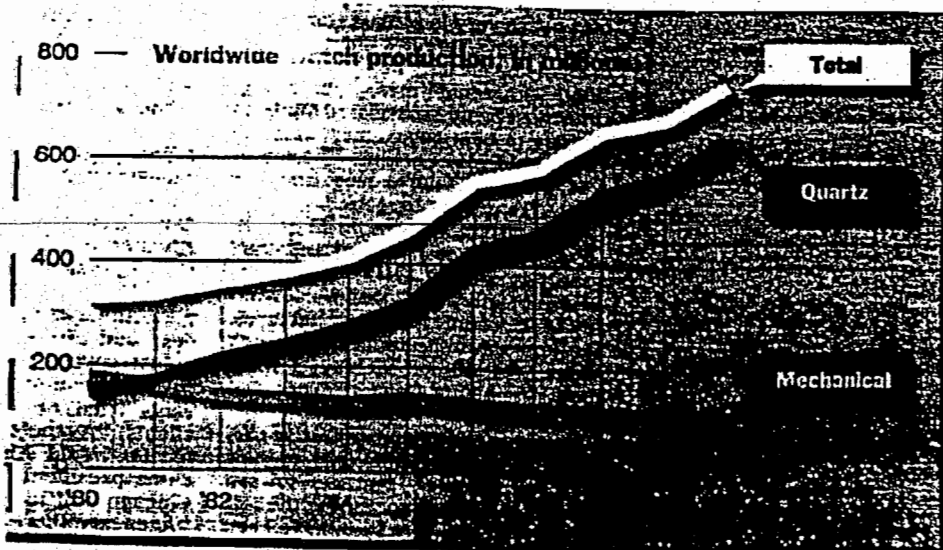
After a spectacular introduction in 1982, with new quartz technology, Swatch sold a stunning 25 million watches in the United States alone. But in the last few years, sales have dropped sharply.

Swatch decided to change its image, said Chris Keigel, vice president of sales and marketing at Swatch. "The brand had lost some of its novelty, its momentum. We were focused too heavily on teen-agers," Mr. Keigel said. "But if you target yourself on people in their 20's, the Swatch can be considered an aspirational thing, something to strive for at that age and younger."

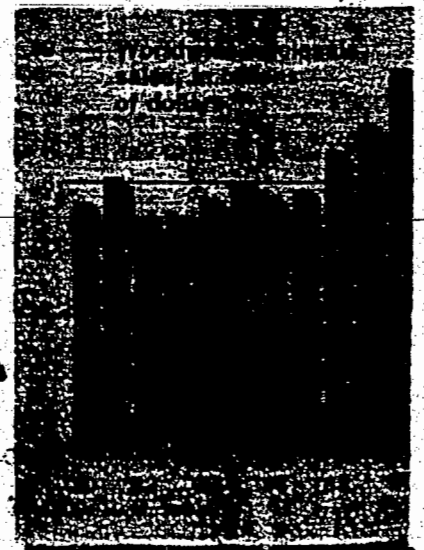
To change its image, last year Swatch introduced a combination chronograph and watch that sold in stores for less than \$100. Swatch sold 100,000 of them in the first few weeks. It also introduced a diving watch with a plastic body and sold it for \$50 retail against the standard \$250 to \$300 for the diving watches made by its competitors.

Swatch is also "getting more American design input," Mr. Keigel said. "European styling is much more colorful, while U.S. design is more traditional, perhaps reflecting a return to basic values," he said.

But Swatch is taking no chances — just a few weeks ago it began showing the works of the Swiss-Austrian artist Alfred Hofkunst, in the form of Pop Art "vegetable" watches — like cucumbers and peppers.



The New York Times



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ATTORNEY DOCKET 98885

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
TRADEMARK TRIAL AND APPEAL BOARD**

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SWATCH S.A.,	:	
	:	
Opposer,	:	
	:	Opposition No. 91169312
V.	:	
	:	Mark: SWAP
	:	
AMY T. BERNARD,	:	Serial No. 78/459527
	:	
Applicant.	:	
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**OPPOSER'S AMENDED AND SECOND SUPPLEMENTAL RESPONSES TO
APPLICANT'S FIRST SET OF INTERROGATORIES**

Opposer, Swatch S.A., ("Opposer" or "SWATCH"), hereby serves its Amended and Second Supplemental Objections and Responses to Applicant's First Set of Interrogatories pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure.

GENERAL OBJECTIONS

1. Opposer objects to each and every interrogatory and request for production in their entirety on the ground that Opposer is responding on the basis of its current knowledge and information. Opposer reserves the right to supplement each of its interrogatories and requests for production.
2. Opposer objects to each and every request insofar as and to the extent it seeks information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege or immunity, and will not produce such information. Any inadvertent disclosure of such information shall not be a waiver of the attorney-

EXHIBIT

Higgins 22

7-10-09

INTERROGATORY NO. 11

Identify the annual sales (in both dollar amount and units) in the United States of each product identified in response to Interrogatory No. 1 since such product was first sold.

RESPONSE NO. 11

Opposer incorporates by reference its General Objections as if fully set forth herein. Opposer objects to this interrogatory on the basis that it seeks information which is proprietary or confidential and no protective order is currently in place. Opposer further objects on the grounds that it is overly broad and vague, in that it requests the sales amounts of "each product" "since such product was first sold" as the time frame stated is too long. Accordingly, responding to this interrogatory would be unduly burdensome.

SUPPLEMENTAL RESPONSE NO. 11

Opposer incorporates by reference its General Objections as if fully set forth herein. Opposer maintains its objection on the grounds that it is overly broad and vague, in that it requests the sales amounts of "each product" "since such product was first sold" as the time

frame stated is too long. Accordingly, responding to this interrogatory would be unduly burdensome.

HIGHLY CONFIDENTIAL INFORMATION

Opposer incorporates by reference its General Objections as if fully set forth herein.

Opposer further objects on the grounds that responding to this interrogatory would be unduly burdensome and overly broad in seeking annual sales (in both dollar amount and units) of *all products sold or licensed* under the SWATCH marks in the United States. The SWATCH mark is used with a myriad of goods and services, and providing the annual sales of each individual good/service identified would be unduly burdensome. Notwithstanding and without waiving these objections, and subject to Applicant's time frame narrowing of January 1, 2001 and geographic limitation to the United States, Opposer provides the following responsive information:

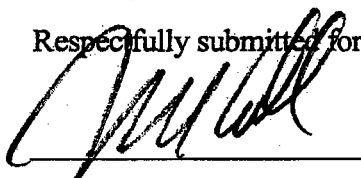
REDACTED

SECOND SUPPLEMENTAL RESPONSE NO. 11

There have been sales for each year since first used for all relevant goods and services made or offered under the SWATCH mark.

Respectfully submitted for

Signed only as to objections:



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(914) 941-6091 Fax
Attorneys for Opposer

Dated: April 2, 2008
JMC/TPG

CERTIFICATE OF SERVICE

I, Edie Garvey hereby certify that I caused true and correct copies of the following:
Opposer's Second Supplemental Responses to Applicant's First Set of Document Production
Request and Opposer's Amended and Supplemental Responses to Applicant's First Set of
Interrogatories to be served upon:

William J. Utermohlen
OLIFF & BERRIDGE, PLC
277 South Washington Street
Alexandria, VA 22314

Via first-class mail, postage pre-paid.

Said service having taken place this 2nd Day of April, 2008.

Edie Garvey

EXHIBIT 133

REDACTED

EXHIBIT 134

REDACTED

CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of October, 2011, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

James A. Oliff VSB 14,658
William J. Utermohlen VSB 41,228
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Alexandria, VA 22314
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Attorneys for Defendant Beehive

/s/ Kenneth W. Curtis